

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA**

SHAUNA WILLIAMS; *et al.*,

Plaintiffs,

v.

REPRESENTATIVE DESTIN HALL, in his
official capacity as Chair of the House
Standing Committee on Redistricting; *et al.*,

Defendants.

Civil Action No. 23-CV-1057

NORTH CAROLINA STATE CONFERENCE
OF THE NAACP; *et al.*,

Plaintiffs,

v.

PHILIP BERGER, in his official capacity as
the President Pro Tempore of the North
Carolina Senate; *et al.*,

Defendants.

Civil Action No. 23-CV-1104

**LEGISLATIVE DEFENDANTS’
MOTION IN LIMINE TO EXCLUDE THE NAACP PLAINTIFFS’ UNTIMELY
DISCLOSURE OF CHRISTOPHER KETCHIE AND RELATED EXHIBITS**

Legislative Defendants, each in their official capacities, by and through undersigned counsel, file this motion in limine to exclude potential testimony from Christopher Ketchie (“Ketchie”), and to exclude his declaration and related exhibits from use at trial. The NAACP Plaintiffs’ belated disclosure of Ketchie as a person with knowledge, along with

their untimely service of his declaration and related analyses violates Rules of Civil Procedure, as well as this Court's Scheduling Order. [D.E. 48]. These violations prejudice Legislative Defendants and will disrupt the trial. As such, exclusion is warranted.¹

In support of this motion, Legislative Defendants contemporaneously file a supporting memorandum of law along with supporting exhibits.

WHEREFORE, Legislative Defendants respectfully request that the Court grant this motion in limine and exclude Christopher Ketchie, his declaration, and all supporting exhibits [D.E. 117-2 at NAACPPX 374-453] or any derivatives thereof from use at trial.

Respectfully submitted this, the 23rd day of May 2025.

BAKER & HOSTETLER LLP

Katherine L. McKnight*
DC Bar No. 994456
Richard B. Raile*
DC Bar No. 1015689
Trevor Stanley*
DC Bar No. 991207
1050 Connecticut Ave. NW
Suite 1100
Washington DC 20036
Ph: (202) 861-1500
rraile@bakerlaw.com
kmcknight@bakerlaw.com
tstanley@bakerlaw.com

**NELSON MULLINS RILEY &
SCARBOROUGH LLP**

By: /s/ Phillip J. Strach
Phillip J. Strach
North Carolina State Bar No. 29456
Alyssa M. Riggins
North Carolina State Bar No. 52366
Cassie A. Holt
North Carolina State Bar No. 56505
Jordan A. Koonts
North Carolina State Bar No. 59363
301 Hillsborough Street, Suite 1400
Raleigh, North Carolina 27603
Ph: (919) 329-3800
phil.strach@nelsonmullins.com

¹ As explained further in Legislative Defendants' memorandum in support of this motion, the NAACP Plaintiffs' exhibit list [D.E. 117-2], claims that a few of Ketchie's maps were used as exhibits in certain depositions. [*Id.* at NAACPPX 386, 389, 392, 401]. To the extent the Court is inclined to grant this motion in part, Legislative Defendants respectfully request that the Court exclude all exhibits other than those the NAACP Plaintiffs actually used in depositions and only to the extent the relevant witness is able to authenticate them upon the NAACP Plaintiffs laying a proper foundation for their use.

Patrick T. Lewis*
Ohio State Bar No. 0078314
Key Tower
127 Public Square, Suite 2000
Cleveland, Ohio 44114
Ph: (216) 621-0200
plewis@bakerlaw.com

Erika D. Prouty*
Ohio State Bar No. 0095821
200 Civic Center Drive, Suite 1200
Columbus, Ohio 43215
Ph: (614) 462-4710
eprouty@bakerlaw.com

* Appeared via Special Notice

alyssa.riggins@nelsonmullins.com
cassie.holt@nelsonmullins.com
jordan.koonts@nelsonmullins.com

Attorneys for Legislative Defendants

CERTIFICATE OF SERVICE

I, Phillip J. Strach, certify that on this, the 23rd day of May 2025, I filed a true and accurate copy of the foregoing document with the Clerk of Court using the CM/ECF electronic filing system, which will send a copy of the same to all counsel of record in the above-captioned matter.

**NELSON MULLINS RILEY &
SCARBOROUGH LLP**

/s/ Phillip J. Strach

Phillip J. Strach

N.C. State Bar No. 29456